

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

United States Courts  
Southern District of Texas  
FILED

May 29, 2020

David J. Bradley, Clerk of Court

# UNITED STATES OF AMERICA

§§§§§§§§

**Criminal No. M-20-0240-S1**

V.

**DANIEL SEPULVEDA  
EVARISTO SEPULVEDA, III  
JUAN INDALECIO GARCIA  
JOSE LUIS GARCIA  
RENE SEPULVEDA**

**SUPERSEDING INDICTMENT**

## THE GRAND JURY CHARGES:

**Count One**

On or about January 17, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**DANIEL SEPULVEDA  
EVARISTO SEPULVEDA, III  
JUAN INDALECIO GARCIA  
JOSE LUIS GARCIA  
and  
RENE SEPULVEDA**

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**Count Two**

On or about January 17, 2019 in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**DANIEL SEPULVEDA  
EVARISTO SEPULVEDA, III  
JUAN INDALECIO GARCIA  
JOSE LUIS GARCIA  
and  
RENE SEPULVEDA**

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more, that is, approximately 320 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**Count Three**

On or about August 30, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JOSE LUIS GARCIA**

did corruptly attempt to, alter destroy, mutilate, and conceal a record, document, or other object or attempt to do so, with intent to impair its integrity and availability for use in an official proceeding.

In violation of Title 18, United States Code, Section 1512(c) (1), and Title 18, United States Code, Section 2.

A TRUE BILL

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FOREPERSON

RYAN K. PATRICK  
UNITED STATES ATTORNEY

  
ASSISTANT UNITED STATES ATTORNEY